

PHILLIP A. TALBERT  
United States Attorney  
ELLIOT C. WONG  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

AIAI QI,	)	Case No. 2:23-CV-0377-DAD-JDP (PS)
	)	
Plaintiff,	)	
	)	<b>DECLARATION OF ELLIOT WONG</b>
v.	)	
	)	
ALEJANDRO MAYORKAS, ET AL.,	)	
	)	
	)	
Defendants.	)	
	)	

I, Elliot C. Wong, declare as follows:

1. I am an Assistant U.S. Attorney and counsel of record for Defendants in this matter.
2. On March 10, 2023, U.S. Citizenship and Immigration Services (“USCIS”) issued an interview notice in Plaintiff’s case. A copy of the notice was mailed to Plaintiff at her address of record and to her immigration attorney of record. A true and correct copy of the notice is attached hereto.

///

///

///

///

DECLARATION

1 3. I e-mailed Plaintiff on March 10, 2023 and provided copies of the interview notice. As of the  
2 date of this declaration, Plaintiff has not responded to my e-mail.

3 I swear under penalty of perjury under the laws of the United States that the foregoing is true and  
4 correct to the best of my knowledge and belief.

5  
6 DATED: April 5, 2023

7 /s/ ELLIOT C. WONG  
8 ELLIOT C. WONG  
9 Assistant United States Attorney  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DECLARATION



Receipt Number ZLA1500174220		Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL	
Received Date 10/21/2015	Priority Date	Applicant A208 476 397 QI, AIAI	
Notice Date 03/10/2023	Page 1 of 3		

<p>AIAI QI 7793 FINNHORSE WAY SACRAMENTO CA 95825</p>	<p><b>Please come to:</b></p> <p>75 Hawthorne St., 7th Floor San Francisco, CA 94105</p> <p><b>On (Date):</b> Tuesday, June 20, 2023 <b>At (Time):</b> 08:30AM</p>
---	--

You and your dependent family members (if any) on your Form I-589 are scheduled for an asylum interview on the date and time shown above. Please read this interview notice in its entirety, as it contains important information about your asylum interview. USCIS asylum offices are open with additional precautions to prevent the spread of the COVID-19 virus. These precautions are listed below, at Section IV. **COVID-19 Safety Precautions.**

**I. You must appear for this interview unless** you, your dependent family members, other members of your household, your attorney or accredited representative, or interpreter:

- Have COVID-19 or any symptoms of COVID-19 according to the Centers for Disease Control and Prevention (CDC), including, but not limited to, a recently developed cough, fever, difficulty breathing, new loss of smell or taste, fatigue, muscle aches, headache, congestion, sore throat, or vomiting (this list does not include all symptoms);
- Have been in close contact (within six feet for a total of 15 minutes or more) with anyone known to have COVID-19 in the past 14 days (unless you are fully vaccinated or if you are a health care worker and consistently wear an N95 respirator and proper personal protective equipment (PPE) or equivalent when in contact with COVID-19 positive individuals);
- Have returned from domestic, international, or cruise ship travel in the past 10 days (unless you are fully vaccinated);
- Have been instructed by a health care provider, public health authority, or government entity to self-isolate or self-quarantine in the past 14 days (unless you have been cleared to end isolation or quarantine); or
- Refuse to wear a face covering or mask in accordance with USCIS policy.

*Fully vaccinated* means it has been at least two weeks since you received your second dose in a two-dose series, or at least two weeks since you received a single-dose vaccine.

You may request to reschedule your appointment due to illness or heightened risk of severe COVID-19 infection due to age or underlying medical conditions, and the delay will not be attributed to you for purposes of obtaining an Employment Authorization Document. **Contact your asylum office in writing as soon as possible if you must reschedule your interview.** For asylum office contact information, visit the Asylum Office Locator page at [egov.uscis.gov/office-locator/#/asy](https://egov.uscis.gov/office-locator/#/asy). Failure to appear for your interview without good cause may result in immediate referral to an immigration judge.

**II. Who should come with you to your interview?**

Only the following people may come with you to your interview:

- Dependents:** All family members included in your asylum application as dependents must come to your interview.
- Interpreter:** If you are fluent in one of the languages listed below, you will be required to use a USCIS contract interpreter at your asylum interview. **DO NOT bring an interpreter.**

Akan	Albanian	Amharic	Arabic	Armenian	Azerbaijani	Bengali	Burmese
Cantonese	Creole/ Haitian Creole	Farsi- Afghani/ Dari	Farsi- Iranian	Foo Chow/ Fuzhou	French	Georgian	Gujarati

Please see the additional information on the back. You will be notified separately about any other cases you filed.

**USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.**

<p>San Francisco Asylum Office U.S. CITIZENSHIP &amp; IMMIGRATION SVC P.O. Box 77530 San Francisco CA 94107</p> <p><b>USCIS Contact Center: <a href="https://www.uscis.gov/contactcenter">www.uscis.gov/contactcenter</a></b></p>	
---	--



Receipt Number ZLA1500174220					Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL				
Received Date 10/21/2015			Priority Date		Applicant A208 476 397 QI, AIAI				
Notice Date 03/10/2023			Page 2 of 3						

Hindi	Hmong	Hungarian	Indonesian/ Bahasa	Konjobal/ Q'anjob'al	Korean	Kurdish	Lingala
Mam	Mandarin	Nepali	Pashto/ Pushtu	Portuguese	Punjabi	Quiche/ K'iche	Romanian
Russian	Serbian	Sinhalese	Somali	Spanish	Swahili	Tagalog	Tamil
Tigrinya	Turkish	Twi	Ukrainian	Urdu	Uzbek	Vietnamese	

- If you are not fluent in English, are not fluent in a language listed above, and choose to speak a different language, you must bring an interpreter to your interview. Your interpreter must:
  - Be at least 18 years old;
  - Not be your attorney or accredited representative, or witness;
  - Not be a representative or employee of your country of nationality, or, if stateless, your country of last habitual residence; and
  - Not have a pending asylum application.
- If you choose to speak a language that is not listed above and you cannot provide a competent interpreter who is fluent in English and your chosen language, you may provide an interpreter who is fluent in a language listed above and your chosen language. USCIS will provide a relay interpreter to interpret between the language listed above and English. If, without good cause, you do not provide an interpreter fluent in your chosen language and English or your chosen language and a language listed above, we may consider that a failure to appear and dismiss your asylum application or refer your asylum application to immigration court.
- If you are fluent in one of the languages listed above and refuse to use a USCIS contract interpreter, we will consider this a failure to appear for your interview without good cause and dismiss your asylum application or refer your asylum application to immigration court. You will also be ineligible for employment authorization based on the delay you caused in the adjudication of your asylum application by refusing to use a USCIS contract interpreter, unless you show exceptional circumstances.
- If you need an interpreter and do not bring one, or if your interpreter is not competent, we may reschedule your interview, dismiss your asylum application, or refer your asylum application to immigration court.
- Attorney or accredited representative:** Your attorney or accredited representative may come with you to the interview. USCIS asylum offices permit attorneys and accredited representatives to participate in the interview remotely via telephone. Please visit the Preparing for Your Asylum Interview page of the USCIS website at [www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview](http://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview) for more information. For your attorney or representative to participate remotely, he or she must receive consent from you to participate remotely, complete the **REMOTE ATTORNEY OR REPRESENTATIVE PARTICIPATION IN AN AFFIRMATIVE ASYLUM AND/OR NACARA 203 INTERVIEW** election form, and submit this election form to the local asylum office at least ten (10) days prior to your scheduled interview. If your attorney or representative requests to modify his or her election of remote participation to in-person participation fewer than 10 days prior to the interview, then the asylum interview may be rescheduled and any rescheduled interview caused by this modification will result in an applicant-caused delay for purposes of employment authorization. Your attorney or accredited representative may find a link to this election form by visiting the Preparing for Your Asylum Interview page of the USCIS website at [www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview](http://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview) or by contacting the local office directly.
- Witnesses:** If you have a witness who will provide testimony in your case, that individual may come with you to your interview. However, we encourage your witness to provide sworn written testimony before your interview and not attend the interview. You may provide this written testimony to USCIS as additional evidence following the guidelines described in **Section IV** below.
- Applicants with a disability:** If you have a disability and have an individual who assists you, that individual may come with you.
- Minor Applicants:** If you are a minor, a trusted adult may come with you.

**III. What to Bring to Your Interview:**

- If available, bring a written form of identification for you and each of your dependent family members (if any) on your Form I-589 which indicates name, date of birth, place of birth, and nationality.
- If available, bring the original and one copy of evidence of your relationship to your dependent family members (if any) on your Form I-589 (such as marriage certificates, birth certificates, or affidavits).

**IV. COVID-19 Safety Precautions:**

Please see the additional information on the back. You will be notified separately about any other cases you filed.

**USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.**

San Francisco Asylum Office  
U.S. CITIZENSHIP & IMMIGRATION SVC  
P.O. Box 77530  
San Francisco CA 94107

**USCIS Contact Center: [www.uscis.gov/contactcenter](http://www.uscis.gov/contactcenter)**



Receipt Number ZLA1500174220		Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL
Received Date 10/21/2015	Priority Date	Applicant A208 476 397 QI, AIAI
Notice Date 03/10/2023	Page 3 of 3	

Please follow the Centers for Disease Control and Prevention (CDC) safety guidelines for the state and county where your asylum office is located. To find the state and county where your asylum office is located, go to: <https://egov.uscis.gov/office-locator/#/asy>.

In areas of high or substantial transmission according to the CDC's COVID-19 by County webpage <https://www.cdc.gov/coronavirus/2019-ncov/your-health/covid-by-county.html>, all federal employees, contractors, and visitors **must wear a mask inside federal buildings**. In DHS-controlled spaces, such as USCIS asylum offices, this guidance supersedes state, local, tribal, or territorial rules regarding face coverings.

- You may not enter the facility more than 15 minutes before your appointment.
- USCIS will provide hand sanitizer at entry points.
- There will be markings and physical barriers in the facility; you should pay close attention to these signs to ensure that you and other individuals accompanying you to your interview can follow social distancing guidelines.
- You may have to answer health screening questions before entering a facility.
- Bring your own **black** ink or **blue** ink pen to your interview.

Depending on local conditions, you may be interviewed **in-person** or through a **video-facilitated interview**. In an **in-person** interview, you will be in the same room with the interviewing officer separated by a plexiglass barrier. In a **video-facilitated** interview, you will be in one room and the interviewing officer in a different room.

Before you come to your interview, read the most current guidance on "Asylum Appointments" by visiting the USCIS Response to COVID-19 page of the USCIS website, located at <https://www.uscis.gov/about-us/uscis-response-to-covid-19>.

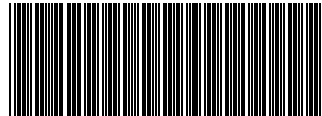
If you wish to submit additional evidence not previously submitted with your asylum application, you should submit it to the asylum office in writing at least 7 to 10 days before the interview. If you bring new evidence on the day of your interview, USCIS may reschedule your interview.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

**USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.**

San Francisco Asylum Office  
U.S. CITIZENSHIP & IMMIGRATION SVC  
P.O. Box 77530  
San Francisco CA 94107

**USCIS Contact Center: [www.uscis.gov/contactcenter](https://www.uscis.gov/contactcenter)**





Receipt Number ZLA1500174220		Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL
Received Date 10/21/2015	Priority Date	Applicant A208 476 397 QI, AIAI
Notice Date 03/10/2023	Page 1 of 3	

<p>YUE ZHANG 2034 BARNETT RD LOS ANGELES CA 90032</p>	<p><b>Please come to:</b></p> <p>75 Hawthorne St., 7th Floor San Francisco, CA 94105</p> <p><b>On (Date):</b> Tuesday, June 20, 2023 <b>At (Time):</b> 08:30AM</p>
---	--

We have mailed an official notice about this case (and any relevant documentation) according to the mailing preferences you chose on Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative. **This is a courtesy copy, not the official notice.**

**What the Official Notice Said**

You and your dependent family members (if any) on your Form I-589 are scheduled for an asylum interview on the date and time shown above. Please read this interview notice in its entirety, as it contains important information about your asylum interview. USCIS asylum offices are open with additional precautions to prevent the spread of the COVID-19 virus. These precautions are listed below, at Section IV. **COVID-19 Safety Precautions.**

**I. You must appear for this interview unless** you, your dependent family members, other members of your household, your attorney or accredited representative, or interpreter:

- Have COVID-19 or any symptoms of COVID-19 according to the Centers for Disease Control and Prevention (CDC), including, but not limited to, a recently developed cough, fever, difficulty breathing, new loss of smell or taste, fatigue, muscle aches, headache, congestion, sore throat, or vomiting (this list does not include all symptoms);
- Have been in close contact (within six feet for a total of 15 minutes or more) with anyone known to have COVID-19 in the past 14 days (unless you are fully vaccinated or if you are a health care worker and consistently wear an N95 respirator and proper personal protective equipment (PPE) or equivalent when in contact with COVID-19 positive individuals);
- Have returned from domestic, international, or cruise ship travel in the past 10 days (unless you are fully vaccinated);
- Have been instructed by a health care provider, public health authority, or government entity to self-isolate or self-quarantine in the past 14 days (unless you have been cleared to end isolation or quarantine); or
- Refuse to wear a face covering or mask in accordance with USCIS policy.

*Fully vaccinated* means it has been at least two weeks since you received your second dose in a two-dose series, or at least two weeks since you received a single-dose vaccine.

You may request to reschedule your appointment due to illness or heightened risk of severe COVID-19 infection due to age or underlying medical conditions, and the delay will not be attributed to you for purposes of obtaining an Employment Authorization Document. **Contact your asylum office in writing as soon as possible if you must reschedule your interview.** For asylum office contact information, visit the Asylum Office Locator page at [egov.uscis.gov/office-locator/#/asy](https://egov.uscis.gov/office-locator/#/asy). Failure to appear for your interview without good cause may result in immediate referral to an immigration judge.

**II. Who should come with you to your interview?**

Only the following people may come with you to your interview:

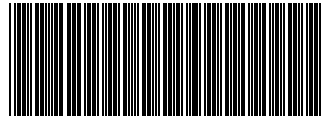
- ***Dependents:*** All family members included in your asylum application as dependents must come to your interview.
- ***Interpreter:*** If you are fluent in one of the languages listed below, you will be required to use a USCIS contract interpreter at your asylum interview. **DO NOT bring an interpreter.**

Please see the additional information on the back. You will be notified separately about any other cases you filed.

**USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.**

San Francisco Asylum Office  
U.S. CITIZENSHIP & IMMIGRATION SVC  
P.O. Box 77530  
San Francisco CA 94107

USCIS Contact Center: [www.uscis.gov/contactcenter](https://www.uscis.gov/contactcenter)





Receipt Number ZLA1500174220					Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL				
Received Date 10/21/2015			Priority Date		Applicant A208 476 397 QI, AIAI				
Notice Date 03/10/2023			Page 2 of 3						

Akan	Albanian	Amharic	Arabic	Armenian	Azerbaijani	Bengali	Burmese
Cantonese	Creole/ Haitian Creole	Farsi- Afghani/ Dari	Farsi- Iranian	Foo Chow/ Fuzhou	French	Georgian	Gujarati
Hindi	Hmong	Hungarian	Indonesian/ Bahasa	Konjobal/ Q'anjob'al	Korean	Kurdish	Lingala
Mam	Mandarin	Nepali	Pashto/ Pushtu	Portuguese	Punjabi	Quiche/ K'iche	Romanian
Russian	Serbian	Sinhalese	Somali	Spanish	Swahili	Tagalog	Tamil
Tigrinya	Turkish	Twi	Ukrainian	Urdu	Uzbek	Vietnamese	

- If you are not fluent in English, are not fluent in a language listed above, and choose to speak a different language, you must bring an interpreter to your interview. Your interpreter must:
  - Be at least 18 years old;
  - Not be your attorney or accredited representative, or witness;
  - Not be a representative or employee of your country of nationality, or, if stateless, your country of last habitual residence; and
  - Not have a pending asylum application.
- If you choose to speak a language that is not listed above and you cannot provide a competent interpreter who is fluent in English and your chosen language, you may provide an interpreter who is fluent in a language listed above and your chosen language. USCIS will provide a relay interpreter to interpret between the language listed above and English. If, without good cause, you do not provide an interpreter fluent in your chosen language and English or your chosen language and a language listed above, we may consider that a failure to appear and dismiss your asylum application or refer your asylum application to immigration court.
- If you are fluent in one of the languages listed above and refuse to use a USCIS contract interpreter, we will consider this a failure to appear for your interview without good cause and dismiss your asylum application or refer your asylum application to immigration court. You will also be ineligible for employment authorization based on the delay you caused in the adjudication of your asylum application by refusing to use a USCIS contract interpreter, unless you show exceptional circumstances.
- If you need an interpreter and do not bring one, or if your interpreter is not competent, we may reschedule your interview, dismiss your asylum application, or refer your asylum application to immigration court.
- Attorney or accredited representative:** Your attorney or accredited representative may come with you to the interview. USCIS asylum offices permit attorneys and accredited representatives to participate in the interview remotely via telephone. Please visit the Preparing for Your Asylum Interview page of the USCIS website at [www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview](http://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview) for more information. For your attorney or representative to participate remotely, he or she must receive consent from you to participate remotely, complete the **REMOTE ATTORNEY OR REPRESENTATIVE PARTICIPATION IN AN AFFIRMATIVE ASYLUM AND/OR NACARA 203 INTERVIEW** election form, and submit this election form to the local asylum office at least ten (10) days prior to your scheduled interview. If your attorney or representative requests to modify his or her election of remote participation to in-person participation fewer than 10 days prior to the interview, then the asylum interview may be rescheduled and any rescheduled interview caused by this modification will result in an applicant-caused delay for purposes of employment authorization. Your attorney or accredited representative may find a link to this election form by visiting the Preparing for Your Asylum Interview page of the USCIS website at [www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview](http://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/preparing-for-your-asylum-interview) or by contacting the local office directly.
- Witnesses:** If you have a witness who will provide testimony in your case, that individual may come with you to your interview. However, we encourage your witness to provide sworn written testimony before your interview and not attend the interview. You may provide this written testimony to USCIS as additional evidence following the guidelines described in **Section IV** below.
- Applicants with a disability:** If you have a disability and have an individual who assists you, that individual may come with you.
- Minor Applicants:** If you are a minor, a trusted adult may come with you.

**III. What to Bring to Your Interview:**

- If available, bring a written form of identification for you and each of your dependent family members (if any) on your Form I-589 which indicates name, date of birth, place of birth, and nationality.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

**USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.**

San Francisco Asylum Office  
U.S. CITIZENSHIP & IMMIGRATION SVC  
P.O. Box 77530  
San Francisco CA 94107

**USCIS Contact Center: [www.uscis.gov/contactcenter](http://www.uscis.gov/contactcenter)**



Receipt Number ZLA1500174220		Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL
Received Date 10/21/2015	Priority Date	Applicant A208 476 397 QI, AIAI
Notice Date 03/10/2023	Page 3 of 3	

• If available, bring the original and one copy of evidence of your relationship to your dependent family members (if any) on your Form I-589 (such as marriage certificates, birth certificates, or affidavits).

**IV. COVID-19 Safety Precautions:**

Please follow the Centers for Disease Control and Prevention (CDC) safety guidelines for the state and county where your asylum office is located. To find the state and county where your asylum office is located, go to: <https://egov.uscis.gov/office-locator/#/asy>.

In areas of high or substantial transmission according to the CDC's COVID-19 by County webpage <https://www.cdc.gov/coronavirus/2019-ncov/your-health/covid-by-county.html>, all federal employees, contractors, and visitors **must wear a mask inside federal buildings**. In DHS-controlled spaces, such as USCIS asylum offices, this guidance supersedes state, local, tribal, or territorial rules regarding face coverings.

- You may not enter the facility more than 15 minutes before your appointment.
- USCIS will provide hand sanitizer at entry points.
- There will be markings and physical barriers in the facility; you should pay close attention to these signs to ensure that you and other individuals accompanying you to your interview can follow social distancing guidelines.
- You may have to answer health screening questions before entering a facility.
- Bring your own **black** ink or **blue** ink pen to your interview.

Depending on local conditions, you may be interviewed **in-person** or through a **video-facilitated interview**. In an **in-person** interview, you will be in the same room with the interviewing officer separated by a plexiglass barrier. In a **video-facilitated** interview, you will be in one room and the interviewing officer in a different room.

Before you come to your interview, read the most current guidance on "Asylum Appointments" by visiting the USCIS Response to COVID-19 page of the USCIS website, located at <https://www.uscis.gov/about-us/uscis-response-to-covid-19>.

If you wish to submit additional evidence not previously submitted with your asylum application, you should submit it to the asylum office in writing at least 7 to 10 days before the interview. If you bring new evidence on the day of your interview, USCIS may reschedule your interview.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

**USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.**

San Francisco Asylum Office  
U.S. CITIZENSHIP & IMMIGRATION SVC  
P.O. Box 77530  
San Francisco CA 94107

**USCIS Contact Center: [www.uscis.gov/contactcenter](https://www.uscis.gov/contactcenter)**

